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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Local Exchange Carrier Line
Information Database

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CC Docket No. 92-24

ORIGINAL
FILE

REPLY TO COMMENTS ON
DIRECT CASE OF THE
AMERITECH OPERATING COMPANIES

Respectfully submitted,

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AMERITECH OPERATING COMPANIES

I. INTRODUCTION AND SUMMARY

The Ameritech Operating Companies¹ file their reply to the comments on their direct case in response to the Order Designating Issues for Investigation released by the Common Carrier Bureau in this docket on March 20, 1991.²

Tariff Transmittal No. 574 filed by the Companies on November 12, 1991, sought to offer a new service, Signal Transfer Point (STP Access), which includes a Dedicated Network Access Link (DNAL). On the same day, the Companies filed Tariff Transmittal No. 575, that sought to offer a new service, Line Information Data Base (LIDB). Both tariff transmittals contained proposed new and revised tariff sheets and a Description and Justification ("D&J"). The Bureau suspended the transmittals for one day, imposed an accounting order, and initiated this investigation in the LEC LIDB Order. The Companies' direct case filed on April 21, 1992, answered the questions asked by the Bureau in the LEC LIDB Order.

¹The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Incorporated.

²Hereinafter referred to as the ("LEC LIDB Order").

The Companies fully supported their STP Access and LIDB tariff filings in the tariff transmittals and D&J. In addition, the Companies' direct case answers the questions asked by the Bureau. As a result, the Companies' tariffs should be allowed to remain in effect, as filed. The Companies will not repeat in their reply comments information and answers previously provided in their tariff transmittals and direct case. Rather, they will respond to additional questions and concerns raised by commenters. The Companies will not attempt to answer questions concerning the tariffs filed by other local exchange carriers (LECs), or to explain differences between the costs, tariffs and rates of various LECs. The Companies, will simply demonstrate that their cost methodology and rates are reasonable and correct. The Companies also will establish that they are providing high quality LIDB and that there is no need to insert technical details in the LIDB tariff. They further will demonstrate that LIDB should not incorporate unregulated billing and collections functions or liabilities. The Companies finally will prove that there is no discrimination concerning fraud protection for LIDB users.

A. The Companies Are Providing High Quality LIDB Service. Specifying Every Technical Detail Of The Service In The Tariff Would Be Counterproductive.

Two commenters feel that the LIDB tariff should provide detailed minimum specifications for LIDB.³ The Companies, as a major user of LIDB, share these ICs' desire for quality LIDB service. However, the focus on the incorporation of technical specifications into the tariff is misplaced. As the Companies explained in their direct case, the terms, conditions and rates for LIDB service are adequately described in the tariff, while the technical

³See, MCI Telecommunications Corporation ("MCI") at pp. 5-10, Allnet Communications Services, Inc. ("Allnet") at pp. 2-3, 4.

specifications of LIDB are properly handled in technical publications.⁴

Repeating the technical publications and details in the tariff will not improve the quality of LIDB. The Companies are committed to meeting the service objectives of LIDB, whether or not they are repeated in the tariff. Rather than improve service, incorporation of technical publications and details in the tariff will simply make the tariff more voluminous and cumbersome and, thereby, more difficult to use.

Moreover, the Companies are providing high quality, reliable and accurate LIDB service today. In addition, they are committed to enhancing LIDB over time. ICs are very important customers of the Companies and the Companies are dedicated to providing quality services to them. Also, LIDB supports the use of the Companies' calling cards. A reliable, accurate validation service enhances the Companies' calling cards and makes them a more attractive billing vehicle for ICs and the Companies' customers. Finally, the Companies are a heavy user of their own LIDB, since it contains validation data regarding their calling cards.

The fact of the matter is, the Companies already have met the objectives identified by MCI in its comments.⁵ As a result, there is no need to insert additional items into the tariff. The Companies will discuss each of MCI's objectives separately.

⁴Ameritech Direct Case at pp. 4-9.

⁵MCI pp.6-7.

1. An explanation of the data that is available in the LIDB database.

This information is in the LIDB tariff.⁶

2. Identification of the LECs stored in the database (*i.e.*, independent companies.)

This information is identified by NPA/NXX in the LIDB Access Routing Guide (SR-OPT-001841), which is updated monthly. A copy of the guide is available to MCI through Bellcore. Currently, 81 LECs (aside from the Companies) store data on the Companies' LIDB databases. The Companies will be pleased to provide the names of these LECs to MCI, if it wishes.

3. The LIDB database will be updated daily, by adding, deleting and modifying end user customer accounts as such customers move, become delinquent on their accounts, order service or cancel service.

The Companies LIDB databases are current and accurate and are updated on a daily basis.

4. Emergency updates relating to lost or stolen cards will be made on a real-time, on-line basis.

Emergency updates to the Companies' LIDB databases for lost or stolen cards are made on a twenty-four hour a day, seven day a week basis.

5. A guarantee that there will be daily 24 hour, single point of contact for LIDB customers to reach the database administrator.

A single point of contact is available for each of the Companies' LIDB database administration centers.

6. A guarantee that LIDB customers will be provided with the scheduled downtime for the database. The downtime should be scheduled to coincide with minimum traffic.

The Companies have naturally followed these common sense procedures for years, without the need of inserting them into a tariff. More importantly, the

⁶Tariff FCC No. 2, 4th Revised Page 132.3, § 6.1.3 A.3.c.

Companies have gone beyond what MCI is requesting and have designed their LIDB to minimize the need to schedule downtime. The Companies' LIDB is supported by two Service Control Points ("SCPs") which are fully redundant. As a result, in the event software is being loaded or maintenance is being performed on one SCP, LIDB simply functions through the other SCP.

7. A section listing LIDB performance standards.

LIDB performance standards are specified in technical publications. In their direct case, the Companies pointed out that Technical Publication TR-NWT-001158 provides detailed performance specifications for LIDB.⁷ The Companies also agreed to add a reference to this publication in their LIDB tariff.⁸ More importantly, the Companies' LIDB is meeting or exceeding its performance objectives, without the need of incorporating the publications into the tariff.

8. The dates of the latest revisions of all reference and technical publications.

As stated in the Companies' direct case, the dates of technical publications are specified in their tariffs.⁹

9. A description of the company's call gapping procedure, including the threshold levels that trigger the use of gapping.

As described in the Companies' direct case, their call gapping procedures are specified in Technical Publication TR-NWT-001158.¹⁰ The

⁷Ameritech Direct Case at p. 8.

⁸*Id.*

⁹Ameritech Direct Case at p. 7.

¹⁰Ameritech Direct Case at p. 8.

Companies offered in their direct case to incorporate a reference to that publication into their tariff.¹¹

10. A description of the carrier's fraud prevention system. A detailed description of the Companies' fraud prevention procedures was provided in the Companies' direct case.¹² Concerning specific fraud control measures, MCI suggests that these measures include "threshold" and "high and low velocity levels" that trigger a warning and an investigation¹³. The Companies' fraud control procedures already incorporate these features for calling cards. The Companies' staff monitors warning messages twenty-four hours a day, seven days a week.

However, the Companies do not agree with MCI's suggestion that the fraud prevention system must set certain threshold levels of call attempts that would "automatically" result in card invalidation. There are times when usage on a particular card may suddenly increase for a short period for a legitimate reason and the Companies believe that their system should accommodate these occurrences. As a result, the Companies generally do not use automatic invalidation, but rather monitor and investigate LIDB warning messages on a full time basis.

The Companies are always exploring ways to improve their fraud prevention system, including consideration of systems that will provide more sophisticated fraud detection devices.

¹¹*Id.*

¹²Ameritech Direct Case at pp. 6-7. *See also*, the Companies' Reply to Petitions to Reject/or Suspend Transmittal No. 575, at pp. 3, 4-5 for a more complete discussion of these procedures.

¹³MCI at p. 13.

B. LIDB Should Not Incorporate Unregulated Billing And Collection Functions Or Liabilities.

MCI proposes that the LECs be liable for fraud on calls that are validated through LIDB.¹⁴ MCI appears to be requesting that LEC LIDB services take on billing and collection functions traditionally performed by commercial credit cards (*i.e.*, "responsibility for fraud.")¹⁵ MCI argues that financial liability will create an incentive for the LECs to implement fraud control mechanisms.

The Companies fully explained why their liability for fraud is limited in their direct case.¹⁶ Specifically addressing MCI's point, there is no need to create an artificial incentive to control fraud, since the Companies are a very large user of LIDB and already have a very powerful incentive to control fraud on their calling cards.

Moreover, guaranteeing collections against fraud is inconsistent with the common carrier functions of LIDB. LIDB was designed and priced for the sole purpose of providing users access to the Companies' validation databases. LIDB does not have tied into it any unregulated, non-common carrier billing and collection functions, such as a guarantee of collection against fraud. The LIDB rates also do not reflect those activities. The Commission should not expand LIDB into these unregulated areas, nor should it compel users to pay for these functions as a part of LIDB. Rather, the Commission should allow the LECs to offer these billing and collection functions through optional unregulated contracts.

¹⁴MCI pp. 14-18.

¹⁵*Supra* at p. 16.

¹⁶Ameritech Direct Case at pp. 6-7.

The Companies decided that a flat charge rate structure is appropriate for LIDB, since the Companies do not incur any greater or lesser risk or costs based on the dollar amount of the call being verified. However, if this fact were to change and the Companies were to take on some responsibility or liability for collection or fraud for calls verified through LIDB, then the rate structure and levels should be adjusted to more closely resemble a billing and collection rate plan. Generally, compensation for billing and collection is based upon a purchase of the billings at a discount, that automatically increases the dollar value of the compensation as the amount of the billing increases. Most credit cards also charge interest and, in many cases, an annual fee.

C. The Companies LIDB Rates Cover All Pertinent Costs, Meet The Net Revenue Test And Are Reasonable In Comparison To Other Competitive Alternatives.

The Companies demonstrated in their Tariff Transmittal No. 575 D&J and their direct case, that their proposed rates for LIDB cover all pertinent costs and meet the net revenue test.¹⁷ No party disputes these facts. With the exception of questions relating to CCSCIS that will be discussed in the next section, no party specifically addresses the costs and factors used by the Companies.¹⁸ Some parties do point to variations between the factors used

¹⁷See Ameritech Direct Case at p.11 and Transmittal No. 575, D&J, p. 9, and Exhibit 7.

¹⁸MCI does state that if differences exist between the STP Access 56 Kbps CCS interconnection link and 56 Kbps special access lines cost, they should be reflected in separate rates for the two links. The Companies fully responded to this issue in their Reply Comments to Petition to Reject/or Suspend Transmittal No. 575 at pp. 5-6.

by various LECs, but none contend that the Companies' factors are unreasonable.

Both MCI and Sprint Communications Company Limited Partnership ("Sprint") assert that the prices above fully loaded costs proposed by the Companies and NYNEX cannot be justified.¹⁹ However, the Companies' LIDB rate is set at modest 3¢ per query. In fact, the Companies rate is at the low end of the range of rates charged by the LECs.

The Companies' Tariff Transmittal No. 575 D&J proves that LIDB is a new and discretionary service for which competitive alternatives exist.²⁰ In summary, LIDB is competitive because validation information on LEC calling cards is only needed by an IC, if it elects to accept LEC calling cards as a billing option for calls on its network. Thus, when viewed in the context of its use, LIDB is an integral part of IC billing and collection. The Commission has consistently found since 1986, that IC billing and collection functions are competitive.²¹

Neither MCI nor Sprint dispute that LIDB is a new service or contest that they have billing options that do not depend upon access to LIDB. MCI makes the argument that validation information on LEC calling cards is only available from LECs.²² Sprint also asserts that there are no alternatives to LIDB.²³ However, these statements ignore the fact that these ICs do not have

¹⁹MCI at p. 24, and Sprint at p. 8.

²⁰At pp. 6-8.

²¹*See, In the Matter of Detariffing of Billing and Collection Services*, CC Docket No. 85-88, Report and Order released January 29, 1986, at paras. 33, 37.

²²MCI at p. 26.

²³Sprint at p. 8.

to use LEC calling cards at all to bill for calls. Rather, if these ICs deem LIDB rates to be unreasonable, they can simply refuse to accept LEC calling cards and bill the calls themselves or through one of the numerous other billing options available to them.

MCI asserts that LIDB rates should not be set at the same level as competitive commercial credit card services.²⁴ MCI correctly points out that unlike commercial credit cards, LIDB is not a service for which the LECs propose to "buy all of its customers receivables" and "incur all loss of fraud." MCI concludes that the LECs are attempting to offer an "inferior service in comparison to commercial credit cards, but . . . charge rates as if these services were on an equal footing."²⁵ If this contention were true, which it is not, then MCI would simply take the better deal offered by the credit card companies. For that reason, in recognition of the nature of LIDB, the Companies chose to establish their LIDB rate at a flat \$.03 cent charge, which for most calls works out to substantially below the discount factors charged by credit card companies.

D. The Companies Justified Why CCSCIS Is Appropriate For Developing Common Channel Signaling (CCS) Services Costs.

Three ICs raise questions about the Common Channel Signaling Cost Information System (CCSCIS). Allnet claims the Companies have failed to adequately describe CCSCIS.²⁶ Sprint acknowledges that the LECs described CCSCIS, but states it is unable to review the model's "reasonableness" since

²⁴MCI at pp. 25-26.

²⁵*Supra.* at p. 25.

²⁶Allnet at p.4.

the CCSCIS model is "proprietary".²⁷ MCI just asks the Commission to make the CCSCIS costing model available for "public scrutiny."²⁸ However, as requested by the Bureau in the LEC LIDB order, the Companies have explained the CCSCIS model, why the use of that model is appropriate for CCS services and its reasonableness.²⁹

The issue of the proprietary nature of switching service costing models is not new. The Bureau has already determined that Bellcore's Switching Cost Information System (SCIS) model and the related Bellcore CCSCIS model are confidential and can be protected from public disclosure.³⁰ None of the commenters dispute that CCSCIS is a valuable trade secret, which is proprietary to Bellcore. CCSCIS contains engineering, pricing and operational information which is proprietary to several companies including: AT&T; Digital Equipment Corp.; Ericsson; Northern Telecom Inc.; and Digital Switch Corporation. This information is voluntarily provided to Bellcore and Bellcore has a contractual obligation not to disclose the data unless written consent of the manufacturers has been obtained. Public disclosure of the CCSCIS model would discourage future cooperation by the equipment providers, who would likely cease making available the data upon which CCSCIS depends. The result would be destruction of the usefulness of this very valuable costing model. Also, disclosure of CCSCIS data would adversely effect the highly competitive marketplace for switching equipment.

²⁷Sprint at p. 2.

²⁸MCI at p. 23.

²⁹Ameritech Direct Case at pp. 12-13.

³⁰See, Commission Requirements For Cost Support Material To Be Filed With Open Network Architecture Access Tariffs, DA 91-1309, (SCIS Waiver Order at ¶ 20 and n.3.)

In addition, if CCSCIS is placed into the public record, potential customers could copy it and use it for free. The value of the CCSCIS model thereby would be undermined and the substantial revenues Bellcore obtains from licenses to use the model would be foregone.

For these reasons, the CCSCIS should not be publicly disclosed. Rather, since there is no dispute regarding the similarity between SCIS and CCSCIS,³¹ the "opinion" as to the reasonableness of the methodology embodied in SCIS soon to be released by Arthur Anderson in the Open Network Architecture ("ONA") proceeding, also should apply to CCSCIS. In addition, CCSCIS was previously provided to the Bureau on November 8, 1991, for a confidential in camera review.³² Thus, it is clearly not an unknown. Also, any potential benefit of a separate independent review of CCSCIS would be far outweighed by the cost and delay that such a process would entail. Under the circumstances, the elaborate and expensive process used for SCIS in the ONA proceeding cannot be justified for CCSCIS in the LIDB tariff filing proceeding.

E. The Mutual Card Honoring Agreement Is An Unregulated Billing And Collection Agreement. The Companies Are Being Compensated By AT&T For Uncollectible Amounts.

Competitive Telecommunications Association ("Comptel") and International Telecharge, Inc. ("ITI") both assert that LECs are discriminating between AT&T and other ICs because the LECs assume the risk of fraud for calls handled by AT&T which are validated through LIDB, while the LECs do not offer the same option to other ICs.³³ However, this concern is based upon

³¹MCI admits at p. 22 that "[t]here can be no doubt that the SCIS and CCSCIS costing models are similar."

³²See, Attachment A.

³³Comptel at pp. 3-6, and ITI at pp. 7-9.

a fundamental misunderstanding of the arrangement between AT&T and the Companies. When the agreement is properly understood, it is clear that no discrimination exists.

The Companies and AT&T have entered into Calling Card Mutual Honoring Agreements. Under the terms of the agreements, AT&T may validate calls on its network that utilize one of the Companies' calling cards. The agreement establishes a billing and collection arrangement for AT&T's calls that utilize the Companies' calling cards. Under that billing and collection arrangement, AT&T sells its calls to the Companies at a discount and the Companies bill, collect and retain the revenue resulting from these billings.

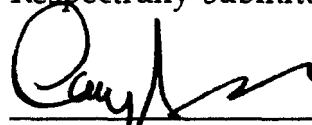
It is true that the Companies assume some of the risk of uncollectibles for AT&T calls billed by the Companies. However, the Companies are compensated for uncollectibles through a specific factor that is built into the discount at which the Companies purchase the billings. This uncollectible factor is adjusted periodically based on actual collection experience.

Thus, no discrimination exists. The assumption by the Companies of uncollectibles for AT&T is part of an unregulated billing and collection arrangement. Moreover, the Companies are compensated for their collection activities, including for any uncollectibles. Finally, the Companies will offer similar terms for mutual card honoring, billing and collection to other ICs.

II. CONCLUSION.

For the above reason the Companies' LIDB and STP Access tariffs should remain in effect, as filed, and the accounting order and investigation should be lifted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Floyd S. Keene', written over a horizontal line.

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Date: June 15, 1992

November 8, 1991

Mr. Richard M. Firestone
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Commission Requirements for Cost
Support Material to be filed with
Open Network Architecture Tariffs;
Transmittal of CCSCIS Model and
Associated Materials

Dear Mr. Firestone:

On October 18, 1991, the Common Carrier Bureau released an order requiring the Ameritech Operating Companies¹ to provide to the Bureau Bell Communications Research, Inc.'s (Bellcore's) proprietary Switching Cost Information System (SCIS) computer model and associated data and documentation, as well as a related Bellcore model known as the Common Channel Signaling Cost Information System (CCSCIS).² The Bureau has decided to initially review a single carrier's models and associated material in camera before resolving the waiver requests filed by the Companies and

¹The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company and Wisconsin Bell, Inc. These entities are occasionally referred to as "the Companies" in this transmittal letter.

²See Cost Support Material To Be Filed with Open Network Architecture Access Tariffs. DA 91-1309 (SCIS Waiver Order) at ¶20 and n.3.

other carriers relating to the material.³ The stated sole purpose of this in camera review is to permit the Bureau to become "more familiar with the operation" of the models and to "determine whether, and if so on what basis, to require disclosure" of the models.⁴ For the purposes of its preliminary review, the Bureau has determined that the models, including the associated documentation and data provided by equipment vendors, should be protected from public disclosure under Exemption 4 of the Freedom of Information Act, 5 U.S.C. 552(b)(4).⁵

Pursuant to the terms of the SCIS Waiver Order, the Ameritech Operating Companies provisionally submit to the Bureau the CCSCIS model, consisting of the confidential software and related data (including equipment vendor data) and documentation listed on Attachment A appended hereto. This material is provided to the Bureau for the sole purpose of facilitating the in camera review discussed in the SCIS Waiver Order. As set forth in the Companies' Petition for Waiver filed September 27, 1991, and as provided in the SCIS Waiver Order, this material is to be treated as confidential under the Commission's implementing regulations, 47 C.F.R. §§0.457(d) and 0.459. No copies of the CCSCIS model on any form of media (including computer memory), or any data or associated documentation, or any portions thereof, except to the extent necessary to review the materials under the terms of the SCIS Waiver Order, shall be made without the prior written permission of the Companies and Bellcore.

With respect to those portions of the CCSCIS model containing proprietary information of equipment vendors, the Companies and Bellcore have been given limited permission to provisionally provide

³Id. at ¶13.

⁴Id.

⁵Id. at ¶14.

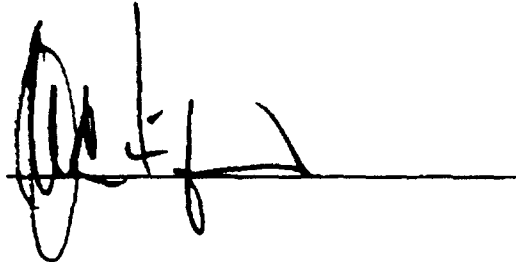
this information to the Bureau. The terms of this permission are set forth in letters from the vendors to Bellcore, which letters are appended hereto as Attachment B. Such vendor proprietary information is to be maintained in confidence under 5 U.S.C. §552(b)(4) and the Commission's implementing regulations, 47 C.F.R. §§0.457(d) and 0.459, and is to be used solely for the Bureau's in camera review, pursuant to the SCIS Waiver Order.

Upon the Bureau's completion of its in camera review, the CCSCIS model, including all copies of the software (on any form of media), all related data and documentation, all vendor information, and any portions thereof furnished hereunder, shall be promptly returned to the Companies. Any information resident on any computer media or memory shall be deleted.

Very truly yours,

The Ameritech Operating Companies

By:

A handwritten signature in black ink, appearing to be "M. F. J.", is written over a horizontal line. The signature is stylized with a large, looped initial "M" and a long, sweeping horizontal stroke at the end.

CERTIFICATE OF SERVICE

I, Diana M. Lucas, do hereby certify that copies of the foregoing reply comments of the Ameritech Operating Company were sent via first class mail, postage paid, on this the 15th day of June 1992:

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